

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ELENA BOTTS, *on behalf of herself and all
others similarly situated,*

Plaintiff,

v.

THE JOHNS HOPKINS UNIVERSITY,

Defendant.

Civil Action No. 1:20-cv-01335-JRR

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF SECOND SETTLEMENT ADDENDUM AND ORDER DIRECTING
NOTICE TO SECOND GROUP OF ADDITIONAL CLASS MEMBERS**

Named Plaintiff and Class Representative Elena Botts, by Class Counsel, hereby moves this Court for preliminary approval of the Second Addendum to Class Settlement Agreement and Release, which is attached as Exhibit 1 to her concurrently filed Memorandum of Law, and for an Order directing notice to the 2,607 class members identified by Defendant after the fairness hearing of December 13, 2023, the Second Group of Additional Students.

Defendant does not oppose the relief sought herein.

Dated: March 29, 2024

Respectfully submitted,

ELENA BOTTS, *by her attorneys,*

/s/John Soumilas

James A. Francis (*pro hac vice*)

John Soumilas (*pro hac vice*)

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Counsel for the Class

CERTIFICATE OF SERVICE

The undersigned certifies that he filed the foregoing document and its exhibits using the Court's CM/ECF system, which shall provide notice of same to all counsel of record.

Dated: March 29, 2024

/s/John Soumilas
John Soumilas